## IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:		) CASE NO.: 21-10337-mdc
FELICIA R. BROV	VN,	)
	Debtor	) CHAPTER 13
ALLY BANK,	Movant	_) HEARING DATE:
VS.		Tuesday, June 8, 2021
		) 9:30 a.m.
FELICIA R. BROWN,		)
and WILLIAM C. MILLER,	Respondent	) LOCATION:
		) U.S. Bankruptcy Court
		) Robert N.C. Nix Federal Courthouse
	Trustee	) Courtroom #2
		900 Market Street
		) Philadelphia, PA 19107

## STIPULATION

COME NOW, this 5th day of

June , 2021, Felicia R. Brown, through

Debtor's attorney, Michael A. Latzes, Esquire and Ally Bank, ("Ally") by and through its attorneys, Mester & Schwartz, P.C., hereby stipulate the following terms of settlement of the Motion for Relief:

WHEREAS the Debtor owns a 2019 HYUNDAI Elantra Sedan 4D SE I4, V.I.N. KMHD74LF4KU863377 ("Vehicle"); and

WHEREAS Ally filed a Motion for Relief from the Automatic Stay ("Motion") with respect to missed post-petition payments; and

It appearing that the Debtor is in current post-petition as of May 18, 2021;

WHEREAS the Debtor and Ally seek to resolve the Motion; it is hereby stipulated and agreed that:

- 1. The Debtor shall remain current with regular monthly payments starting with the regular monthly payment of \$449.07 due on June 15, 2021, and all such future payments due on the 15th of each month thereafter.
- 2. If Debtor shall fail to make to payments under the terms of the Stipulation and

Debtor fail to cure said default within fifteen (15) days after notice by Ally (or its counsel) of said default, counsel for Ally may re-list this Motion for Relief from the Automatic Stay by filing an Amended Notice of Hearing with the Court.

- 3. This Stipulation is a supplement and in addition to the Contract between the parties and not in lieu thereof.
- 4. Facsimile signatures shall be accorded the same force and effect as an original signature, and may be submitted to the Court.

BY THE COURT:

Magdeline D. Coleman

Magdelin D. Colem

CHIEF U.S. BANKRUPTCY JUDGE

Creditor: Ally Bank

By Counsel: Mester & Schwartz, P.C.

By:

Jason Brett Schwartz, Esquire Mester & Schwartz, P.C.

1917 Brown Street

Philadelphia, Pennsylvania 19130

(267) 909-9036

DATED: ///1/4

Case 21-10337-mdc Doc 39 Filed 06/05/21 Entered 06/07/21 08:01:41 Desc Main Document Page 3 of 4

Seen and agreed to -- We hereby consent to the form and entry of the foregoing Order.

Debtor: Felicia R. Brown

By Counsel for Debtor: Michael A. Latzes, Esquire

Michael A. Latzes, Esq.

Law Offices of Michael A. Latzes

1528 Walnut Street

Suite 700

Philadelphia, PA 19102

(215) 545-0200

DATED:

Chapter 13 Trustee

No Objection

/s/ LeeAne O. Huggins

William C. Miller, Trustee P.O. Box 1229 Philadelphia, PA 19105 (215) 627-1377

Dated:

Please send copies to:

Felicia R. Brown 5809 Cedar Avenue Philadelphia, PA 19143

Michael A. Latzes, Esq. Law Offices of Michael A. Latzes 1528 Walnut Street Suite 700 Philadelphia, PA 19102

William C. Miller, Esq. Chapter 13 Trustee P.O. Box 1229 Philadelphia, PA 19105

Office of the U.S. Trustee 200 Chestnut Street, Suite 502 Philadelphia, PA 19107

Jason Brett Schwartz, Esquire Mester & Schwartz, P.C. 1917 Brown Street Philadelphia, PA 19130